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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MARIJA ANDESILIC and PASSION
LOWE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

RUBBERMAID INCORPORATED,

Defendant.

Case No. 2:25-cv-03736-HDV-SK

District Judge Hon. Hernán D. Vera

**STIPULATION TO CONTINUE
BRIEFING SCHEDULE ON
DEFENDANT'S MOTION TO
DISMISS SECOND AMENDED
COMPLAINT**

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs Marija Andesilic and Passion Lowe and Defendant Rubbermaid
2 Incorporated, by and through their respective counsel, hereby stipulate and agree as
3 follows:

4 1. Plaintiffs filed their Second Amended Complaint (“SAC”) on August 28,
5 2025 (ECF No. 27).

6 2. Defendant filed a Motion to Dismiss (“MTD”) SAC on September 29,
7 2025 (ECF No. 29).

8 3. The Parties filed their Joint Stipulation to Continue Briefing Schedule on
9 Defendant’s MTD on November 14, 2025 (ECF No. 33), which the Court granted on
10 November 17, 2025 (ECF No. 34).

11 4. Pursuant to the Court’s Order (ECF No. 34), Plaintiffs’ current deadline
12 to file an opposition to the MTD SAC is December 22, 2025 and Defendant’s deadline
13 to file a reply in support of the MTD SAC is January 12, 2026. Currently, the hearing
14 date of Defendant’s MTD SAC has been continued by the Court’s order to January 29,
15 2026 (ECF No. 34).

16 5. Good cause exists for the requested extension because the Parties are
17 currently engaged in active and productive discussions regarding a potential resolution
18 and require additional time to continue those efforts. The Parties have met and
19 conferred in good faith and, through their respective counsel, jointly agree that
20 continuing the related briefing deadlines and hearing date for Defendant’s MTD SAC
21 will best serve judicial economy and conserve the resources of both the Court and the
22 Parties.

23 6. The Parties therefore request that Plaintiffs’ deadline to file an opposition
24 be continued to January 15, 2026; that Defendant’s reply brief be due 21 days after
25 any opposition is filed; and that the hearing be re-scheduled on a date convenient to
26 the Court, but not fewer than 14 days after the reply brief is filed.

27 IT IS HEREBY STIPULATED:
28

1. Plaintiffs' deadline to file an opposition to Defendant's MTD SAC shall be continued to January 15, 2026.

2. Defendant's reply brief in support of the MTD SAC shall be 21 days after the opposition is filed, if any, by February 5, 2026.

3. The hearing on Defendant's MTD SAC shall be re-scheduled on a date convenient to the Court, but no sooner than February 19, 2026, 14 days after the reply brief is filed.

IT IS SO STIPULATED.

DATED: December 22, 2025

Respectfully submitted,

CLARKSON LAW FIRM, P.C.

By: /s/ Bahar Sodaify

Ryan J. Clarkson

Bahar Sodaify

Attorneys for Plaintiffs

DATED: December 22, 2025

SHOOK, HARDY & BACON L.L.P.

By: */s/ Russell L. Taylor*

Tammy B. Webb

Mitch Engel

Kate Frerking

Russell L. Taylor

Attorneys for Defendant

ATTESTATION OF FILER

Pursuant to Local Rule 5-4.3.4, the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 22, 2025

CLARKSON LAW FIRM, P.C.

/s/ Bahar Sodaify

By: Bahar Sodaify

Attorneys for Plaintiffs